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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FREDERICK K. PASOUR,

Plaintiff,

v.

PHILADELPHIA HOUSING AUTHORITY
and JOHN F. STREET,

Defendants.

Civil Action No. _____

13**2258**

NOTICE OF REMOVAL

Defendants Philadelphia Housing Authority and John F. Street (collectively, “Defendants”), by their undersigned counsel, hereby provide Notice of Removal of the above-captioned case from the Court of Common Pleas of Philadelphia County, Pennsylvania to the United States District Court for the Eastern District of Pennsylvania pursuant to 28 U.S.C. §§ 1331 and 1441. Removal is proper for the following reasons:

1. On or about September 19, 2011, Plaintiff Frederick K. Pasour (“Plaintiff”) filed a Praecipe to Issue Writ of Summons against Defendants in the Court of Common Pleas of Philadelphia County, Pennsylvania, which did not present a removable case. On March 28, 2013, Plaintiff filed a complaint (the “Complaint”) against Defendants. Defendants received an electronic copy of the Complaint on March 28, 2013.

2. A true and correct copy of the Praecipe to Issue a Writ of Summons is attached hereto as Exhibit “A” and a true and correct copy of the Complaint, with verification, is attached hereto as Exhibit “B”.

3. This Notice of Removal is timely as it is filed within thirty days after the receipt of the Complaint by Defendants, as required by 28 U.S.C. § 1446(b).

4. Pursuant to Rule 81 of the Federal Rules of Civil Procedure, the time for Defendants to answer, move or otherwise plead with respect to the Complaint has not yet expired.

5. This Court has original jurisdiction over the above-described action pursuant to 28 U.S.C. § 1331 because plaintiff purports to assert a cause of action under the federal Constitution pursuant to 42 U.S.C. § 1983.

6. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 over the remaining state claims plaintiff purports to assert in his Complaint, and no basis exists for this Court to decline to exercise such supplemental jurisdiction over these state law claims.

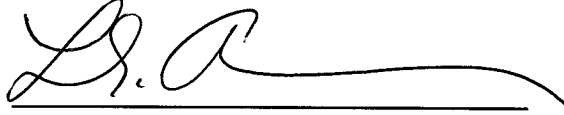
7. All Defendants consent to the removal of this action to this Court.

8. Under 28 U.S.C. § 1441(a), the United States District Court for the Eastern District of Pennsylvania is the proper venue for removal jurisdiction because it embraces the place where this action is pending.

9. Concurrent with the filing of this notice, Defendants are serving this notice upon Plaintiff's counsel and filing a copy of the notice with the Prothonotary of the Court of Common Pleas of Philadelphia County, Pennsylvania, pursuant to 28 U.S.C. § 1446(d).

WHEREFORE, Notice is given that this action is removed from the Court of Common Pleas of Philadelphia County, Pennsylvania to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Engelmyer', with a long horizontal flourish extending to the right.

Dated: April 26, 2013

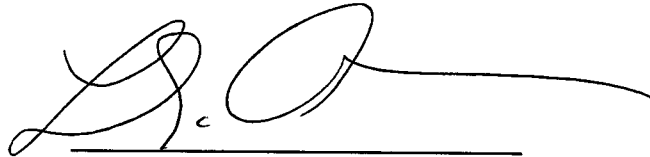
Steven J. Engelmyer, Esquire
Eric J. Schreiner, Esquire
Lorena E. Ahumada, Esquire
KLEINBARD BELL & BRECKER LLP
One Liberty Place, 46th Floor
1650 Market Street
Philadelphia, PA 19103
(215) 568-2000

CERTIFICATE OF SERVICE

I, Lorena E. Ahumada, Esquire, hereby certify that on this 26th day of April, 2013, I filed the foregoing Notice of Removal via the Court's ECF system. I further certify that on this same date, I caused a true and correct copy of the same to be served via U.S. Mail upon the following:

Alan B. Epstein, Esquire
Jennifer Myers Chalal, Esquire
SPECTOR GADON & ROSE P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103

Counsel for Plaintiff Frederick K. Pasour

A handwritten signature in black ink, appearing to be 'L. Ahumada', with a long horizontal line extending to the right.

Lorena E. Ahumada, Esq.